



U.S. Department of Justice

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February 4, 2022

The Honorable Catherine C. Blake
United States District Court for the District of Maryland
Garmatz Federal Courthouse
101 West Lombard Street
Baltimore, Maryland 21201

Re: *United States v. Farace et al.,*
Criminal No. CCB-21-294

Dear Judge Blake:

I write regarding the status of the above-captioned case. The two defendants in this case, Ryan Farace (“R. Farace”) and Joseph Farace (“J. Farace”), have each been charged in a one-count indictment charging them with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). The defendants had their initial appearances, and J. Farace his arraignment, on October 8 and October 6, respectively.

The parties thereafter met and conferred regarding discovery as required by Rule 16.1. The government believe it has now substantially completed Rule 16 discovery, but there have been issues ensuring defense counsel can access all the electronic device images that have been produced. Additionally, discovery in this matter is relatively voluminous and counsel have been engaged in trial and motions practices for other matters. Consequently, the parties respectfully request a status call in 60 days to either set a motions schedule or apprise the Court of the possibility of pre-trial resolution. The parties have further agreed, for similar reasons, to toll the Speedy Trial Clock during this period, and will file a motion in this regard forthwith.

Very truly yours,

/s/
Dana J. Brusca
Assistant United States Attorney

cc: Gerry Ruter, Esq. (via ECF)
David Little-Washington, Esq. (via ECF)